

7-16-02

From Jerry Blomberg -Sunoptics Skylights

To Brian Alcorn -California Energy Commission

Subject: Response to Jon McHugh's circulation of amendments to Lighting Control requirements for California Building Energy Efficiency Standards.

Section 119(e) have no problem with the proposed amendment.

Item 4. The last line in the first paragraph should read; less than closed loop controls. I also agree with Jon that a small dead band should always be included in an open loop system.

Item 6. Cost effectiveness is part of any requirement and the adding of a LCD display would only tell that there was a voltage signal available but it would not tell you how the ballasts were responding. With a light meter it would be very easy to measure the available light with and without the electric lights to see what the contribution from the electric lighting is, or how much dimming was actually taking place. I vote against the requirement.

Item 7. I agree with the proposed requirement to have delays return after period of one hour or less.

Item 8. I do not know of any test standard for photo-cells, but my experience over the last 15 years is that if you eliminate photo-conductive cells for daylighting controls, you have solved the problem.

The indicator light to show photo-cell failure is another added cost that time has proven to not be required. In 15 years and approximately 100 installations I have not seen a photo-cell failure.

I don't know of any reason to place daylighting control sensors out doors unprotected from the elements.

119 (g) The idea that an astronomical time clock can be used to replace photo controlled switching or dimming is ridiculous and should be removed from the standard. The standard should not include practices that won't work and will only lead to customer dissatisfaction and frustration. If

there were no weather conditions, no shading from trees or buildings there might be a rational argument for it as a substitute for photo-controls but that is not the case. If an astronomical time clock is included it would appear that the California Energy Commission is approving an unworkable system.

Since I have proposed that daylighting controls be included in spaces as small as 900 square feet I further propose that the controls could be satisfied with a two hour spring wound timer. This will work for \$20.